

MARK E. FERRARIO (Nevada Bar No. 1625)
TAMI D. COWDEN (Nevada Bar No. 8994)
ALAYNE M. OPIE (Nevada Bar No. 12623)
GREENBERG TRAURIG
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Fax: (702) 792-9002
Email: ferrariom@gtlaw.com,
cowdent@gtlaw.com,
opiea@gtlaw.com

Attorneys for SHAC, LLC dba Sapphire Gentlemen's Club,
SHAH MT, LLC, David Michael Talla, and Peter Feinstein

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CORISSA JONES, on behalf of herself and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SHAC, LLC D/B/A SHAPPHIRE [*sic*]
GENTLEMEN'S CLUB; SHAC MT, LLC;
DAVID MICHAEL TALLA and PETER
FEINSTEIN,

Defendants.

SHAH, LLC,

Counterclaimant,

CORISSA JONES, and all others similarly
situated who opt into this litigation,

Counterdefendants.

Case No. 2:15-cv01382-RFB-CWH

**STIPULATION AND [PROPOSED]
ORDER REGARDING TAKING
DEPOSITIONS OUTSIDE THE CLOSE
OF DISCOVERY AND EXTENDING
CERTAIN DISCOVERY DEADLINES**

[First Request]

In accordance with LR 6-1 and 26-4, IT IS HEREBY STIPULATED AND AGREED, by and
between Plaintiffs/Counter-Defendants, including Corissa Jones and all Plaintiffs who opted into the
instant action ("Class Plaintiffs"), by and through their counsel of record, the law firm of Kennedy
Hodges LLP, and Defendants/Counter-claimants SHAC, LLC, SHAC, MT, LLC, David Michael

1 Talla and Peter Feinstein (“SHAC”), by and through their counsel of record, the law firm of
2 Greenberg Traurig, LLP, as follows:

- 3 1. The deadline to close discovery is currently July 20, 2018;
- 4 2. 10 Opt-In Plaintiffs’ depositions are presently scheduled during the timeframe of June 29,
5 2018 through July 6, 2018;
- 6 3. Plaintiffs’ counsels have scheduling conflicts during that time and have requested that the
7 depositions be reset;
- 8 4. In order to accommodate Plaintiffs, Defendants are willing to reschedule the depositions
9 to occur during the week of August 20, 2018, anticipating that 2 depositions of roughly 3-
10 4 hours will occur on M-F of that week.
- 11 5. The parties do not stipulate to any other discovery taking place after July 20, 2018;
- 12 6. Because this extension of time effects the present deadline to file dispositive motions, the
13 parties stipulate and agree to extend the deadline to submit the same to September 28,
14 2018;
- 15 7. Moreover, the parties agree to extend the date to submit the proposed joint pretrial order
16 to October 29, 2018;
- 17 8. A trial date has not been set;
- 18 9. This is the first request for an extension of time;

19 Discovery Completed

- 20 10. Plaintiffs submitted initial 26(f) disclosures on or about December 29, 2017;
- 21 11. Defendants submitted initial 26(f) disclosures on or about August 14, 2017, and two
22 supplements thereafter;
- 23 12. Plaintiffs have propounded, and Defendants have responded to, interrogatories, requests
24 for production of documents, and requests for admission;
- 25 13. Defendants propounded interrogatories, requests for production of documents and
26 requests for admissions on an agreed sample of 30 Opt-In Plaintiffs, two of whom have
27 voluntarily withdrawn from the case, and have received responses from 28.

14. Plaintiffs have taken the depositions of Peter Feinstein, Brett Feinstein, John Lee, and the
FRCP 30(b)(6) representative of SHAC, LLC;

Discovery Remaining

15. The parties met and conferred regarding Plaintiffs' discovery responses on June 14, 2018;

16. Although Plaintiffs agreed to supplement some of their responses, Defendants reserve all
rights to submit a motion to compel;

17. Defendants have requested leave of the Court to take an additional 20 depositions.
Plaintiffs have opposed that motion.

Why Discovery Was Not Completed

18. In addition to the reasons set forth above, Defendants had believed that an agreement as
to representative discovery had been made, Plaintiffs contend the agreement did not
included depositions. As a result, Defendants sought emergency leave to take the
additional depositions, and Plaintiffs have opposed. That Motion is set to be heard July
10, 2018.

IT IS SO STIPULATED.

DATED this 28th day of June, 2018.

DATED this 28th day of June, 2018.

GREENBERG TRAURIG, LLP

KENNEDY HODGES LLP

By: /s/ Tami D. Cowden

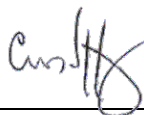
By: /s/ William M. Hogg

MARK E. FERRARIO (NV 1625)
TAMI D. COWDEN (NV 8994)
ALAYNE M. OPIE (NV 12623)
3773 Howard Hughes Pkwy., Suite 400N
Las Vegas, NV 89169
Counsel for Defendants

DAVID W. HODGES (admitted *pro hac vice*)
WILLIAM M. HOGG (admitted *pro hac vice*)
Texas Bar No. 00796765
4409 Montrose Blvd., Ste 200
Houston, TX 77006
Counsel for Plaintiffs

IT IS SO ORDERED

July 2, 2018



UNITED STATES MAGISTRATE JUDGE